

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LILLY ANNE HOPKINS, aka
SAMUEL HOPKINS, TDCJ
#1986831, JOHN B. CONNALLY
UNIT,

Plaintiff

V.

BOBBY LUMPKIN, et al.,

Defendants.

Civil No. 4:19-CV-05041

**JOINT MOTION FOR ORDER ENTERING STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

Plaintiff Lilly Anne Hopkins and Defendants Bobby Lumpkin, Lannette Linthicum, Joseph Penn, Phonso Rayford, Roger Boyd, and Pamela Wagner have stipulated to the attached Confidentiality Agreement and Proposed Protective Order (“Protective Order”) to govern the disclosure of documents, things, and information of the parties or nonparties in the above-captioned action.

Pursuant to Fed. R. Civ. P. 26(c), the Parties hereby jointly move the Court to order the attached proposed Protective Order.

Dated: May 19, 2022

Respectfully submitted,

<p><u>/s/ Jayme Partridge</u></p> <p>Danielle J. Healey Texas State Bar No. 09327980 Fed. ID No. 000035021 healey@fr.com Jayme Partridge Texas State Bar No. 17132060 Fed. ID No. 19621 partridge@fr.com FISH & RICHARDSON P C. 1221 McKinney Street, Suite 2800 Houston, Texas 77010 Telephone: 713-654-5300 Fax: 713-652-0109</p> <p>Sarah E. Jack (<i>pro hac vice</i>) Minnesota State Bar No. 0400118 jack@fr.com FISH & RICHARDSON P.C. 3200 RBC Plaza 60 South 6th Street Minneapolis, Minnesota 55412 Telephone: 612-335-5070 Fax: 612-288-9696</p> <p>Brian Klosterboer Texas State Bar No. 24107833 S.D. Tex. 3314357 bklosterboer@aclutx.org Savannah Kumar (<i>pro hac vice</i>) Texas State Bar No. 24120098 skumar@aclutx.org Adriana Piñon Texas State Bar No. 24089768 S.D. Tex. 1829959 apinon@aclutx.org</p>	<p><u>/s/ Jacob Przada</u></p> <p>KEN PAXTON Attorney General of Texas</p> <p>BRENT WEBSTER First Assistant Attorney General</p> <p>GRANT DORFMAN Deputy First Assistant Attorney General</p> <p>SHAWN E. COWLES Deputy Attorney General for Civil Litigation</p> <p>SHANNA E. MOLINARE Division Chief Law Enforcement Defense Division</p> <p>JACOB E. PRZADA Attorney-In-Charge Assistant Attorney General Texas State Bar No. 24125371 Southern District I.D. No. 3725701 jacob.przada@oag.texas.gov</p> <p>SHEAFFER K. FENNESSEY Attorney-In-Charge Assistant Attorney General Texas State Bar No. 24109859 Southern District I.D. No. 3439719 Sheaffer.fennessey@oag.texas.gov</p> <p>Law Enforcement Defense Division Office of the Attorney General P.O. Box 12548, Capitol Station Austin, Texas 78711</p>
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<p>Andre Segura Texas State Bar No. 24107112 S.D. Tex. 3123385 asegura@aclutx.org AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF TEXAS, INC. 5225 Katy Fwy., Suite 350 Houston, Texas 77007 Telephone: 713-942-8146 Fax: 713-942-8966</p> <p><i>Counsel for Plaintiff Lilly Anne Hopkins, aka Samuel Hopkins, TDCJ #1986831</i></p>	<p>(512) 463-2080 / (512) 370-9996 (fax)</p> <p><i>Attorneys for Defendants</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record on this 19th day of May 2022 via CM/ECF.

/s/ Jayme Partridge
Jayme Partridge